

EXHIBIT R

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

ANTHONY BARASKY,
Plaintiff

CIVIL ACTION

CASE NO. 4:21-cv-02041

v.

KEVIN DENT et al.

Defendants.

**DISCLOSURES OF PLAINTIFF PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 26(a)**

Plaintiff, by and through his attorney, Leonard Gryskewicz, Jr., pursuant to Federal Rule of Civil Procedure 26(a) does hereby provide the following initial disclosures:

The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. Anthony Barasky, 1534 Louisa Street, Williamsport, PA 17701
2. Kevin Dent
3. Tyson Havens
4. Joshua Bell
5. Clinton Gardner
6. Christopher Kriner
7. Joseph Hope
8. Matthew Thomas Sumpter
9. Old Lycoming Township Police Officer Brown
10. Old Lycoming Township Police Officer Engel
11. K. Michael Sullivan, Esq., 48 West Third Street, Williamsport, PA 17701

12. Lycoming County District Attorney's Office, 48 West Third Street, Williamsport, PA 17701

A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses.

1. See attached.
2. Phone seized during the traffic stop is in the possession of Anthony Barasky's minor child and has been used by Anthony Barasky's minor child since it was returned to Plaintiff by the Williamsport Police.

A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based.

1. Actual damages for emotional distress, fear, humiliation, embarrassment, loss of time, incarceration, damage to reputation, damage to credit, and all other damages outlined in the amended complaint which are not readily calculable but can be awarded by a jury.
2. Actual damages of \$9,407.41 from Avis Rent A Car plus any interest, collection fees, and late charges from the Visa account this charge was placed on, \$673.32 owed to Avis Rent A Car and various debt collectors plus any interest, collection fees, and late payments, \$3,536.36 owed to Pennsylvania College of Technology and various debt collectors of this debt plus any interest, collection fees, and late charges, \$379.39 from over drafted account from West Branch Valley Federal Credit Union plus any interest, collection fees, and late charges, \$275.91 for PNC Bank account closed with negative balance plus any interest, collection fees, and late charges, \$3,533.55 in rent payments made while incarcerated, \$6,435.00 in legal fees and costs to defend against the prosecution of the unjust criminal charges.
3. Punitive damages, which are not readily calculable but can be awarded by a jury.
4. Attorney's fees and costs. This amount fluctuates based upon the amount of time Plaintiff's counsel must reasonably spend prosecuting

this case. Similarly, the amount of costs incurred will fluctuate and increase as the litigation unfolds based upon the reasonable costs incurred by Plaintiff.

Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

1. Not applicable to Plaintiff.

Disclosure of expert testimony pursuant to Federal Rule of Civil Procedure 26(a)(2)

1. At this time, Plaintiff is unable to disclose the name of any expert or experts that will be called at trial. Plaintiff reserves the right to supplement this disclosure.

Disclosures of Pre-Trial information pursuant to Federal Rule of Civil Procedure 26(a)(3)

1. Plaintiff is unable to disclose any additional or other information other than what has already been provided. Plaintiff reserves his right to supplement this disclosure pursuant to Federal Rule of Civil Procedure 26(a)(3).

Respectfully Submitted,

Dated: 6/29/2022

s/ Leonard Gryskewicz, Jr.
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